

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

JASON KESSLER	)	
and	)	
DAVID MATTHEW PARROT,	)	
	)	
<i>Plaintiffs</i>	)	
	)	
v.	)	Civil Action No.: 3:19-cv-00044
	)	
CITY OF CHARLOTTESVILLE, et als,	)	
	)	
<i>Defendants</i>	)	

**DEFENDANT JONES' OPPOSITION TO PLAINTIFFS' MOTION TO ALTER OR  
AMEND JUDGMENT CIV. R. 59(E) AND FOR RELIEF FROM JUDGMENT CIV. R. 60**

Defendant Maurice Jones, by counsel, opposes Plaintiffs' motion filed pursuant to Rules 59(e) and 60 to alter or amend judgment and for relief from judgment. In support of his opposition, Defendant Jones hereby joins in and incorporates by reference AL THOMAS'S BRIEF IN OPPOSITION TO MOTION TO ALTER OR AMEND JUDGMENT CIV. R. 59(E) AND FOR RELIEF FROM JUDGMENT CIV. R. 60 filed March 25, 2020, ECF Doc.

For the reasons stated therein, Defendant Jones respectfully requests that this Court deny Plaintiffs' Motion to Alter or Amend Judgment Civ. R. 59(e) and for Relief from Judgment Civ. R. 60 and request such other and further relief as this Court deems appropriate.

Defendant Jones requests that the Court decide Plaintiffs' Motion on the papers, as oral argument is unnecessary.

MAURICE JONES,

By Counsel

By: /s/ Rosalie Pemberton Fessier  
Rosalie Pemberton Fessier  
VSB # 39030  
Brittany E. Shipley  
VSB # 93767  
Attorneys for Defendant Jones  
**TimberlakeSmith**  
25 North Central Avenue  
P. O. Box 108  
Staunton, VA 24402-0108  
phone: 540/885-1517  
fax: 540/885-4537  
email: [rfessier@timberlakesmith.com](mailto:rfessier@timberlakesmith.com)

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2020, I have electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Elmer Woodard, Esquire  
5661 US Hwy 29  
Blairs, VA 24527

James E. Kolenich, Esquire  
Kolenich Law Office  
9435 Waterstone Blvd, Suite 140  
Cincinnati, OH 45249  
*Counsel for Plaintiffs*

Richard H. Milnor, Esquire  
Taylor Zunka Milnor & Carter LTD  
414 Park Street  
Charlottesville, VA 22902  
*Counsel for City of Charlottesville and Richardson*

Erin Rose McNeill, Esquire  
Office of the Attorney General of Virginia  
202 North Ninth Street  
Richmond, VA 23219  
*Counsel for Defendant Crannis-Curl*

David P. Corrigan, Esquire  
Melissa Y. York, Esquire  
Harman Claytor Corrigan & Wellman  
P O Box 70280  
Richmond, VA 23255  
*Counsel for Defendant Thomas*

/s/ Rosalie Pemberton Fessier  
Rosalie Pemberton Fessier  
VSB # 39030  
Brittany E. Shipley  
VSB # 93767  
Attorneys for Defendant Jones  
**TimberlakeSmith**  
25 North Central Avenue  
P. O. Box 108  
Staunton, VA 24402-0108  
phone: 540/885-1517  
fax: 540/885-4537  
email: [rfessier@timberlakesmith.com](mailto:rfessier@timberlakesmith.com)